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Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK**

WILMINGTON TRUST, NATIONAL ASSOCIATION, AS
TRUSTEE FOR THE BENEFIT OF THE REGISTERED
HOLDERS OF COREVEST AMERICAN FINANCE 2020-1
TRUST MORTGAGE PASS-THROUGH CERTIFICATES,

Plaintiff,

-against-

HIRSCHHORN ESTATES LLC, MEYER HIRSCHHORN,
CITY OF ROCHESTER and JOHN DOE NO. I THROUGH
JOHN DOE NO. XXX, inclusive, the last thirty names being
fictitious and unknown to plaintiff, the persons or parties
intended being the tenants, occupants, persons or corporations, if
any, having or claiming an interest in or lien upon the premises
described in the complaint,

Defendants.

Case No. 6:23-cv-06662-EAW

NOTICE OF MOTION TO APPOINT A RECEIVER

PLEASE TAKE NOTICE Wilmington Trust, National Association, as Trustee for the benefit of the registered holders of Corevest American Finance 2020-1 Trust Mortgage Pass-Through Certificates (“**Plaintiff**” or “**Lender**”), hereby moves this Court, the United States District Court for the Eastern District of New York, for the appointment of a receiver together with such other and further relief as this Court may deem just and proper, with respect to certain real

property, improvements thereon, and personal property located in Rochester, New York (collectively, the “**Property**”).

PLEASE TAKE FURTHER NOTICE that Lender’s Motion is supported by the accompanying Memorandum in Support of Motion for the Appointment of Receiver, Declaration of Russ Tuman Supporting Lender’s Motion to Appoint Receiver, and exhibits attached thereto, and upon all of the proceedings and pleadings had herein.

PLEASE TAKE FURTHER NOTICE that responses in opposition, if any, shall be served fourteen (14) days after filing of this Motion or on by other date as ordered by the Court; and

PLEASE TAKE FURTHER NOTICE that replies shall be served seven (7) days after filing of any responses in opposition or by such other date as ordered by the Court.

Dated: New York, New York
November 22, 2023

Respectfully submitted,

POLSINELLI PC

By: /s/ Bradley R. Gardner

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